REMARKS

Claims 1-21 are pending in the application. Claims 1-3, 8, 11-12 and 15 stand rejected as being anticipated by U.S. Patent No. 5,778,362 to <u>Nanjo</u> et al. Applicants respectfully submit that at the very minimum, <u>Nanjo</u> fails to disclose or suggest the inventions of claims 1 and 15. In particular, <u>Nanjo</u> fails to disclose or suggest a method for managing textual database including, e.g., *transcribing textual data into corresponding semantic units of words*, or *generating an index based on semantic units of words for indexing stored textual data with the corresponding semantic units*, as essentially claimed in claims 1 and 15.

In the Final Office Action, Examiner maintains that <u>Nanjo</u> "inherently" discloses transcribing text files into "semantic units". Applicants disagree with such contention. <u>Nanjo</u> merely discloses <u>generating character strings as index terms by applying simple, predefined character level rules to a text file for delimiting character strings in the text file</u>, i.e., (i) *generating preliminary index terms by breaking the text string of the text file based on known character separators or character type transitions*, and (ii) *generating other index terms from certain types of preliminary index terms by applying a step-index process to generate various character strings.*

Applicants contend that <u>Nanjo</u> does not disclose or suggest *transcribing textual data into corresponding semantic units of words*, as contemplated by the claimed inventions. In fact, Examiner's broad interpretation of <u>Nanjo</u>'s character strings as being "semantic units" is erroneous and inconsistent with the teachings of Applicants' specification. For instance, as explained on pages 21~23 of Applicants' specification, <u>because the *same* syllable (semantic unit of word) can have different pronunciations and be written differently, such semantic information</u> <u>*cannot* be extracted directly from text.</u>. In the claimed invention, a semantic unit can represents a

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common semantic meaning for different words that may contain the same semantic unit but represented by different character strings.

In this regard, Examiner cannot reasonably contend that the mere <u>direct processing</u> of the character strings as taught by <u>Nanjo</u> "inherently" discloses the claimed process of transcribing text files into "semantic units". Again, <u>Nanjo</u> teaches <u>nothing more than generating character strings as index terms based on simple, predefined character rules for delimiting character strings</u>. This is clearly not the same or similar to *transcribing the text into semantic units*. In fact, as previously noted, <u>Nanjo</u> expressly states that the disclosed *"method is not dictionary-based and requires <u>no special understanding of the language being indexed or searched</u>"* (see, Col. 3, lines 12-15). Transcribing textual data into *semantic units of words*, such as syllables or morphemes, implies understanding of the language so that the textual data can be parsed into such semantic units of words.

Furthermore, it is respectfully submitted that Examiner's reliance on <u>Nanjo</u> as disclosing *Kanji* character strings being broken into smaller tokens, including a single character that can represent a syllable, is misplaced and misses the point. Indeed, notwithstanding that <u>Nanjo</u> may disclose generating a single character index term that may be a syllable in the given language, <u>Nanjo</u> still does <u>not</u> disclose or suggest a mechanism *for transcribing the textual data into semantic units of words* - again, <u>Nanjo</u> merely discloses generating index terms of character strings from textual data based on simple character level rules.

Accordingly, for at least the above reasons, claims 1 and 15 are clearly patentably distinct and patentable over <u>Nanjo.</u> In addition, claims 2-3, 8 and 11-12 are patentably distinct and patentable over <u>Nanjo</u> at least by virtue of their dependence from claim 1. Thus, withdrawal of the anticipation rejections is requested.

Claim Rejections- 35 U.S.C. § 103

The following obvious rejections were asserted in the Office Action:

(i) Claims 7, 10 and 14 stand rejected as being unpatentable over <u>Nanjo</u>;

(ii) Claims 4-6, 16 and 18-21 stand rejected as being unpatentable over <u>Nanjo</u> in view of U.S. Patent No 5,960,447 to <u>Holt</u> et al.; and

(iii) Claims 9 and 17 stand rejected as being unpatentable over <u>Nanjo</u> in view of U.S. Patent No 5,933,525 to <u>Makhoul</u> et al.

The above rejections are based, in part, on Examiner's reliance on <u>Nanjo</u> as disclosing transcribing/indexing based on semantic units. However, as discussed above, <u>Nanjo</u> clearly does not disclose or suggest transcribing/indexing based on semantic units of words, as essentially claimed in claims 1, 15 and 16. Therefore, the above cited combinations of references fail to establish a *prima facie* case of obviousness against claim 16 and all claims that depend from claim 1 and 16. Therefore, withdrawal of the obviousness rejections is requested.

Respectfully submitted,

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